

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

CASE NO.: 1:CR-01-39

J. Rambo

UNITED STATES OF AMERICA,

Plaintiff,

vs.

HARRY SABOWITZ,

Defendant.

FILED
HARRISBURG

DEC 01 2006

MARY E. D'AMOREA, CLERK
Per
DEPUTY CLERK

JOINT MOTION FOR EXTENSION OF TIME
TO FILE PRETRIAL MOTIONS

COMES NOW the Defendant, HARRY SABOWITZ, by and through his undersigned attorney, and moves this Honorable Court for an Order granting an extension of time to file pretrial motions in this matter, and as grounds for this motion hereby submits the following:

1. That, pursuant to your honor's case management Order all pretrial motions are to be filed by December 4, 2006.
2. That, to date, undersigned counsel has not received discovery and was informed by Assistant United States Attorney, Christy Fawcett that said discovery would be sent some time during the week of December 4, 2006.
3. That, undersigned counsel believes that this will be a paper intensive case.
4. That, it is impossible to determine what pretrial motions need to be filed without the receipt of this discovery.

5. That, undersigned counsel believes that he will need at least thirty (30) days after receipt of discovery in which to prepare and file pretrial motions.
6. That, undersigned counsel spoke with Assistant United States Attorney, Christy Fawcett who has no objection to this motion.

WHEREFORE the Defendant, HARRY SABOWITZ, respectfully requests that this Honorable Court grant a thirty (30) day extension from the date of receipt of discovery to file pretrial motions.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished this 30th day of November, 2006 to Assistant United States Attorney, Christy Fawcett, United States Courthouse, 228 Walnut Street, 2nd Floor, P.O. Box 11754, Harrisburg, PA 17108.

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By: 

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